

### **REMARKS**

Claims 1-24 are currently pending in the application; with claims 1, 12, 14, and 20 being independent. Claims 8, 13, and 21 are withdrawn from further consideration as being drawn to non-elected species, according to Applicant's election filed May 17, 2004. Claim 17 was withdrawn from consideration by the Examiner as also being directed to a non-elected species. Applicant respectfully requests entry of this amendment and favorable consideration in light of the comments contained herein, and earnestly seek timely allowance of the pending claims.

#### ***Claim Rejections – 35 USC §103***

The outstanding Office Action indicated claims 1, 5-7, 9-10, 14, 16, 18-19, and 22-24 are rejected under 35 USC §103(a) as being unpatentable over US 6,496,208 to Bernhardt et al. ("Bernhardt") in view of US Patent No. 5,253,338 to Tanaka ("Tanaka"). Applicant submits the Examiner has failed to establish a *prima facie* case of obviousness and traverses this rejection.

Regarding claims 1 and 14, Bernhardt discloses a method and apparatus for displaying a navigating data in the form of a graph structure. Bernhardt primarily discloses a software-based implementation which runs on a general-purpose computer as shown in Fig. 6. The general-purpose computer includes a memory device 122, a display device 147, and a processing unit 121. Bernhardt further discloses a user interface 20, which displays data to a viewer through display device 147. A frame window 20 contains four related windows 30-33 to assist the user in navigating a data structure from a data source. (See col. 4, lines 10-19; Fig. 4.) The four windows 30-33 are identified as a layout window 30, a thumbnail window 31, a path window 32, and a details window 33. Thumbnail window 31 shows a miniature outline of the entire data

tree. A raised area control component 40 within the thumbnail view acts much like the “thumb” of a normal scrollbar. The position of thumb 40 over the miniature view of the graphic shown in window 31 determines the portion (18a) of the tree that is shown in the layout view in window 30. Thumb 40 displays the enlarged portion of the graphic that is shown in window 30 in relationship to the entire graphic that is displayed in window 31. (See col. 4, lines 10-67; Fig. 4; col. 5, lines 1-16; Fig. 5.)

However, as admitted by the Examiner in the Office Action, Bernhardt fails to disclose, at least, “wherein the entire image is superimposed on the main image display,” as recited in claims 1 and 14.

Moreover, Bernhardt merely displays graphics data in the form of charts, and is distinguished by the present invention which displays images, not charts.

Tanaka fails to cure the deficiencies of Bernhardt in this respect.

Tanaka merely teaches a semi-automatic image tracing method for graphics and processing devices, in which image points of the image data are traced in a semi-automatic fashion and a switch control is arranged to continue the tracing upon a decision made on the trace conditions at a branch point of the tracing path, thereby tracing the image points of the image data while confirming the tracing path. (See column 2, lines 25-33.) In the graphics processor, the trace processing for the image starts upon the designation for tracing and implements tracing the image points according to the tracing conditions set in the control data parameter table, and is caused to be interrupted at every branch point of the tracing path at which the designation by the operator is required during the trace processing. As the trace processing is interrupted, the image data in the neighborhood of the branch point is enlarged and displayed by

the branch point neighborhood display processing section to thereby wait for the designation for tracing from the operator to be made next, and the trace processing is continued upon the next designation for tracking. (See column 2, line 65 through column 3, line 10.)

In Figure 5, Tanaka further teaches an alternate method of display use for the semi-automatic trace processing. Here, Tanaka teaches using the auxiliary view port 46, which is embedded in the main display 42, to display the position in the vicinity of the branch point whereby the neighborhood of which is displayed in an enlarged fashion. (See column 7, lines 51-55.) As shown in Fig. 5, auxiliary view port 46 merely shown an image which displays in an enlarged fashion the neighborhood in the vicinity of branch point P1. The main view port 41, which auxiliary view port 46 is placed into, displays the entire image data 42. (See col. 7, lines 45-55; Fig. 5.)

In summary, Tanaka discloses displaying a partial image on a whole image, which is distinguished by the present invention that can display a whole image on a partial image, which, for example, may be used for framing an electronic zoom. Applicant therefore submits the purpose and effect of the present invention are different from those of Tanaka.

Applicant respectfully points out that this argument was previously presented in a prior reply submitted November 11, 2004, when Tanaka was used as a basis for another 103 rejection along with Hamamura. (See Office Action of November 10, 2004, pages 13-14 bridging paragraph.)

Accordingly, Applicant respectfully requests the Examiner withdraw the rejection of claims 1 and 14. Claims 5-7, 9, 10 depend from claim 1 and are allowable at least by virtue of

their dependency. Claims 16, 18, and 19 depend from claim 14 and are allowable at least by virtue of their dependency from claim 14.

The Office Action indicated that claims 12 and 20 are rejected under 35 USC §103(a) as being unpatentable over US Patent No. 6,567,120 to Hamamura et al. ("Hamamura") in view of Bernhardt. Applicant respectfully traverses this rejection.

Hamamura merely teaches an information processing apparatus which provides a simplified operation relating to switching of information input modes in an electronic camera. After photographing a picture image, memo information may be input and superimposed onto a previous photographic picture image if input within a prescribed time period. (See abstract.) Specifically, the information processing apparatus according to the invention includes a mode selection unit which selects a photographic mode and a memo input mode. A control unit controls the mode selection unit. A detection unit detects whether input has occurred based on a position information input device. In the event that the detection unit detects the occurrence of input from the position information input device, and provided the photographic mode is selected by the mode selection unit, the control unit controls the mode selection unit so as to cause it to select the memo input mode (column 1, lines 57-66).

However, Hamamura fails to teach or suggest, at least, "a display control device... having electronic program logic, which when information is stored in the memory device representing an image, is operable for causing the display control device to retrieve the stored information and display a portion of the image represented by the stored information as a main image on the display panel and range information indicating the portion of the image display in relation to entire image represented by the stored information," as recited in claim 12 (emphasis

added), and “a photography device which converts an optical image to image information... displaying a portion of an image represented by information stored in said memory device as a main image on a display panel... displaying range information indicating the portion of the image displayed in relation to an entire image represented by the stored information,” as recited in claim 20 (emphasis added).

Bernhardt fails to cure the deficiencies of Hamamura in this respect. Bernhardt merely discloses a method for enabling effective browsing and examination of large amounts of data that are organized or classified in a data structure. Bernhardt allows a user to explore and/or view large amounts of data by a novel navigation and rendering scheme (col. 2, lines 46-53). That is, Bernhardt is directed at data visualization wherein a structure has been imposed on data, and provides a way of displaying these structures when they get large (col. 1, lines 16-20). Bernhardt further discloses utilizing a display for using characterizing data in a database having many records stored on multiple, possibly distributed storage devices. Each record has many attributes or fields for which a representative database might include age, income, number of children, education level, marital status etc. Such data can be obtained, for example, from a census data gathered from many people in response to a survey. (Col. 4, lines 37-44.)

Bernhardt is distinguished by the present invention in that the data for which Bernhardt displays does not represent image data. Bernhardt merely displays data which represents other quantities in the form of a graphical tree which is displayed as an image, however, the data itself does not represent image data.

Accordingly, Applicant respectfully requests the Examiner withdraw the rejection of claims 12 and 20.

The Office Action indicated that claims 2 and 3 are rejected under 35 USC §103(a) as being unpatentable over Bernhardt in view of Tanaka and further in view of Bullock. Applicant disagrees and respectfully traverses the rejection. Claims 2 and 3 depend from claim 1 and include all of the features recited therein. As provided above, Bernhardt and Tanaka fail to teach all of the features of independent claim 1. Bullock fails to cure the deficiencies of Tanaka and Bernhardt in this respect.

Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claims 2 and 3.

Claims 4 and 15 are rejected under 35 USC §103(a) as being unpatentable over Bernhardt in view of Tanaka and further in view of Chiba. Applicant respectfully traverses this rejection.

Claims 4 and 15 depend from claims 1 and 14, respectively, and include all of the features recited therein. As provided above, Bernhardt and Tanaka fail to teach all of the features recited in claims 1 and 14. Chiba fails to cure the deficiencies of these references in this respect.

Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claims 4 and 15.

The Office Action indicated that claim 11 is rejected under 35 USC §103(a) as being unpatentable over Bernhardt in view of Tanaka and further in view of Ejima. Claim 11 depends from claim 1 and includes all of the features recited therein. As provided above, Bernhardt and Tanaka fail to teach all of the features recited in claim 1. Ejima fails to cure the deficiencies of these references in this respect.

Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claim 11.

***Conclusion***


In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at telephone number (703) 205-8000, which is located in the Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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